

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

SEALED

UNITED STATES OF AMERICA

v.

Case No. 15-MJ-21

SALLY IRIRI,

Defendant.

COMPLAINT FOR VIOLATION OF TITLE 18, UNITED STATES CODE,
SECTIONS 1343 & 2

BEFORE United States Magistrate Judge
Stephen L. Crocker

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

1. During the period beginning in or about October 2013 and continuing to in or about March 15, 2015, in the Western District of Wisconsin and elsewhere, the defendant,

SALLY IRIRI,

along with other individuals known and unknown, devised and intended to devise a scheme to defraud and to obtain property by means of materially false and fraudulent pretenses, representations and promises, knowing that said material pretenses, representations and promises would be false and were false when made.

2. As part of the scheme to defraud, IRIRI and others targeted victims by creating fake profiles on legitimate internet dating services. Once in with contact

victims, IRIRI and others expressed strong romantic emotions for victims, thereby gaining their trust. IRIRI and others also told victims that they were planning to move to be with the victims.

3. It was further part of the scheme to defraud that, after gaining the victims' trust, IRIRI and others defrauded the victims out of money in a variety of ways, including getting victims to pay so called "inheritance taxes" on non-existent inheritances, and getting victims to send money in exchange for checks, which were fraudulent.

4. It was further part of the scheme to defraud that, at the direction of IRIRI and others, each of the victims wire transferred money into a Bank of America bank account in IRIRI's name.

5. For the purpose of executing and attempting to execute the above described scheme, on or about the dates indicated below, in the Western District of Wisconsin, the defendant,

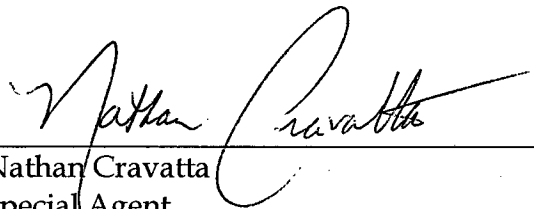
SALLY IRIRI,

knowingly caused writings, signs and signals, consisting of wire money transfers, in the amounts indicated, to be transmitted by means of interstate wire communications between Wisconsin and New York, more specifically from Victim J.W.'s Wells Fargo bank account in Park Falls, Wisconsin, to defendant IRIRI's bank account at Bank of America in New York, New York.

<u>Count</u>	<u>Date</u>	<u>Amount</u>
1	January 3, 2014	\$ 8,300
2	January 6, 2014	\$10,875
3	January 7, 2014	\$ 4,240

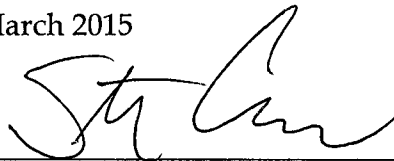
(All in violation of Title 18, United States Code, Sections 1343 & 2).

This complaint is based on the attached affidavit of Special Agent Nathan Cravatta.



Nathan Cravatta
Special Agent
Bureau of Homeland Security, Bureau of
Immigration and Customs Enforcement

Sworn to before me this 30th day of March 2015



HONORABLE STEPHEN L. CROCKER
United States Magistrate Judge

